

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JOSE SANTOS MAURICIO RAMIREZ,

Plaintiff,

18-cv-00296 (ST)

- against -

ROKA JAPANESE FOOD INC.,
et al.,

Defendants.

DECLARATION OF JACOB ARONAUER

I, Jacob Aronauer, declare under penalty of perjury, and pursuant to 28 U.S.C. § 1746, that the following is true and accurate:

1. I am the owner of the law firm the Law Offices of Jacob Aronauer. This office represents Jose Santos Mauricio Ramirez (“Plaintiff” or “Ramirez”) in the above-captioned action.
2. I make this declaration in support of Plaintiff’s motion for attorneys’ fees and expenses.
3. The Law Offices of Jacob Aronauer is a one-attorney law firm with approximately four time part-time paralegals. Our law firm represents both employees and employers in all aspects of labor and employment law, including wage and hour matters under the Fair Labor Standards Act, 29 U.S.C. § 201 et seq. (“FLSA”) and the New York Labor Law (“NYLL”)
4. I have worked on this lawsuit since its inception. As such, I am personally familiar with the facts and circumstances herein.

5. After reviewing the transcript of the November 5, 2018 trial, I worked with Karin Weston, a paralegal in my office, in creating Excel spreadsheets setting forth Plaintiff's damages.
6. I asked Ms. Weston to draft two spreadsheets. The first spreadsheet sets forth Plaintiff's damages as if he was not paid any overtime at all in the course of his employment with Defendants. A copy of this spreadsheet is annexed hereto as Exhibit A.
7. As discussed in the findings of fact and conclusion of law, we believe this is the proper way to calculate Plaintiff's damages.
8. In the event that the Court believes that Plaintiff was paid straight time for all the work he performed and is only owed half time for his overtime hours, a spreadsheet setting forth his damages is annexed hereto as Exhibit B.
9. Both spreadsheets, though, take into consideration the following areas of recovery: liquidated damages, interest, the Wage Theft Prevention Act and reasonable attorney's fees and expenses.
10. I am an attorney whose practice focuses primarily on employment law. Specifically, my office represents employees in wage and hour and discrimination matters.
11. I received my J.D. from Suffolk Law School in 2005.
12. From 2007 through 2012, I worked for the New York City Mayor's Office of Labor Relations.
13. I started my own law firm in January 2013.

14. Since I started my practice, I have almost exclusively represented employees and employers in wage and hour cases. I have handled approximately 100 FLSA and NYLL cases.
15. In 2018, I was voted a “Rising Star” in the New York area by Super Lawyers.
16. My hourly rate is \$350 an hour. This hourly rate is what I charge my management side clients.
17. Experienced paralegals who performed work on this case are billed at \$125 per hour.
18. The hours submitted are supported by my records, are reasonable and were necessarily expended on this litigation. Below is a chart representing the hours and hourly rate I am requesting:

Individual:	Rate:	Total Hours:	Totals:
Jacob Aronauer	\$350	40.40	\$14,140.00
Paralegal Rate	\$125	21.62	\$2,702.50
Total Attorney and Paralegal Costs:			\$16,842.50

19. A copy of all the time my law firm spent on this matter is annexed hereto as Exhibit C.
20. Below is a chart summarizing all reasonable expenses that this office incurred in the prosecution of this matter. Please note that these costs do not take into account photocopying, printing and travel expenses.

EXPENSES	AMOUNT
Filing Fee	\$400
Translator for Trial	\$700

Trial Transcript:	\$340.38
Office Expenses	No charge
Total Expenses:	\$1,440.38

Dated: December 7, 2018
New York, New York

**THE LAW OFFICES OF
JACOB ARONAUER**

/s Jacob Aronauer
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